

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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PURDUE PHARMA L.P., <i>et al.</i> , ¹	:	Case No. 19-23649 (RDD)
	:	
Debtors.	:	Jointly Administered
	:	
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**MOTION OF THE UNITED STATES TRUSTEE FOR LEAVE TO EXCEED THE PAGE
LIMIT IN FILING ITS REPLY IN SUPPORT OF UNITED STATES TRUSTEE’S
AMENDED EXPEDITED MOTION FOR A STAY OF CONFIRMATION ORDER
AND RELATED ORDERS PENDING APPEAL PURSUANT
TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 8007**

**TO: THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:**

William K. Harrington, the United States Trustee for Region 2 (the “United States Trustee”), hereby submits this Motion (the “Motion”) for Leave to Exceed the Page Limit in Filing Its Reply in Support of United States Trustee’s Amended Expedited Motion for a Stay of Confirmation Order and Related Orders Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007, and in support thereof, respectfully states:

1. Pursuant to the Court’s *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, dated November 18, 2019 [ECF No. 498] (the

¹ The “Debtors” in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

“Case Management Order”), “[u]nless granted prior permission, motions, applications and objections are limited to 40 pages and replies and statements are limited to 20 pages.”

2. On September 15, 2021, the United States Trustee filed a Motion for Stay Pending Appeal (as amended,² the “Stay Pending Appeal Motion”). *See Memorandum of Law In Support Of United States Trustees Expedited Motion For A Stay Of Confirmation Order And Related Orders Pending Appeal Pursuant To Federal Rule Of Bankruptcy Procedure 8007* [ECF No. 3778].

3. In response, the Debtors filed their *Memorandum of Law in Opposition to the Motions for Stays of the Confirmation Order and the Advance Order Pending Appeal* [ECF No. 4014] (the “Stay Opposition Brief”), simultaneously with the *Debtors’ Motion for Leave to Exceed the Page Limit in Filing Memorandum of Law in Opposition to the Motions for Stays of the Confirmation Order and the Advance Order Pending Appeal* [ECF No. 4013] (“Debtors’ Motion to Exceed Page Limit”). The Debtors’ Motion to Exceed Page Limit sought leave from the Court to exceed the 40-page limit for objections under the Case Management Order. The Debtors’ Stay Opposition Brief totaled 68 pages in length (59, excluding the table of contents, authorities, and title page).

² *See Amended Memorandum of Law In Support Of United States Trustee’s Expedited Motion For A Stay Of Confirmation Order And Related Orders Pending Appeal Pursuant To Federal Rule Of Bankruptcy Procedure 8007* [ECF No. 3801]; *Second Amended Memorandum Of Law In Support Of United States Trustees Amended Expedited Motion For A Stay Of Confirmation Order And Related Orders Pending Appeal Pursuant To Federal Rule Of Bankruptcy Procedure 8007* [ECF No. 3972].

Other parties in interest also filed motions for stay pending appeal (collectively, the “Stay Motions”). *See, e.g., State of Washington’s Motion for Stay Pending Appeal* [ECF No. 3789]; *State of Maryland’s Motion for Stay Pending Appeal of Confirmation and Trust Advances Orders* [ECF No. 3845]; *Motion for Stay Pending Appeal filed by Ronald Bass Sr.* [ECF No. 3860]; *Motion for Stay Pending Appeal on behalf of Certain Canadian Municipality Creditors and Canadian First Nation Creditors* [ECF No. 3873]; *Motion for Stay Pending Appeal filed by Ellen Isaacs* [ECF No. 3890].

4. Additionally, several other parties filed similar oppositions or joinders to oppositions to the Stay Motions (collectively, the “Additional Opposition”), including, without limitation:

- The Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants—*see Ad Hoc Committee’s Objection to Stay Motions* [ECF No. 4002];
- The Official Committee of Unsecured Creditors—*see Opposition of the Official Committee of Unsecured Creditors to Motions for Stay Pending Appeal* [ECF No. 4006];
- The Ad Hoc Group of Individual Victims—*see Ad Hoc Group of Individual Victims’ (I) Objection to the United States Trustee’s and Certain Public Creditors’ Motion for Stay Pending Appeal and (II) Joinder in the Opposition of the Official Committee of Unsecured Creditors to Motions for Stay Pending Appeal* [ECF No. 4012]; and
- The MSGE Group—*see Opposition of the MSGE Group to the Motions to Stay Pending Appeal* [ECF No. 4016].

5. In order to provide the Court with a meaningful response and adequately address the arguments in the Debtors’ 59-page Stay Opposition Brief, as well as in the Additional Opposition (together with the Stay Opposition Brief, the “Objections to Stay Motions”), the United States Trustee requires more than the 20-pages allowed for replies under the Court’s Case Management Order. The United States Trustee has endeavored to minimize the length of its Reply in Support of United States Trustee’s Amended Expedited Motion for a Stay of Confirmation Order and Related Orders Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007 (the “Reply”), which totals 48 pages, exclusive of tables and contents and tables of authorities.

6. For the foregoing reasons, the United States Trustee respectfully requests that the Court grant permission for the United States Trustee to file the Reply in excess of 20-pages, which Reply is filed concurrently herewith.

CONCLUSION

WHEREFORE, the United States Trustee respectfully requests entry of the proposed order attached hereto as Exhibit A, granting leave to the United States Trustee to file its 48-page Reply, in excess of the 20-page limit set forth in the Case Management Order.

Dated: November 1, 2021
New York, New York

Respectfully submitted,

WILLIAM K. HARRINGTON
UNITED STATES TRUSTEE, Region 2

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